

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DIVISION OF HAZARDOUS WASTE MANAGEMENT

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Responsible Party Remedial Action

Ms. Janet Feldstein, Project Manager
 Site Compliance Branch
 U.S. Environmental Protection Agency
 26 Federal Plaza
 New York, New York 10278

SEP 02 1988

Dear Ms. Feldstein:

Re: SCP Carlstadt
 Comment Response
 ARAR Document

Please be advised of the following response to the concerns of the SCP Carlstadt PRP Group (the "Group") in their correspondence of August 22, 1988.

Table 1.1

1. The application of MCL's as ARAR's is valid. There is a lack of data concerning the interaction of the 3 aquifers on-site. A vertical gradient of contaminants has been established. Therefore, protection of the bedrock aquifer is of major concern.
2. Proposed MCL's are valid as "to be considered" material. Please refer to the first page of the ARAR package given to the Group:

"This paper also identifies material that may be considered for evaluating remedial alternatives when an ARAR does not exist for a contaminant or action or does not ensure a protective remedy. While not legally enforceable, "To be considered" material may provide useful information or recommended procedures that explain or amplify the content of ARAR's. State and Federal guidance documents are examples of "to be considered" material. . .

Table 1.2

1. This table was included as the New Jersey Water Pollution Control Act is a ground and surface water statute. In addition, surface run-off from the site (on-site/off-site transport) can reach Peach Island Creek. Thus, these values should be considered during the selection of the optimum remediation plan.

Table 1.3

This classification is based on the amount of natural total dissolved solids (TDS) found in a given aquifer system. GW2 indicates a natural TDS of 500 mg/l or less. This GW2 classification includes the bedrock aquifer. Why did the Group refer to GW4? This classification has no bearing on this site. The Group must demonstrate the natural TDS value for all on-site aquifers to be in excess of 500 mg/l to petition for a change of classification.

Table 1.5

Please see the response to Table 1.1, Item 2.

Table 4.1

1. As the quantity of potable water in the State of New Jersey is limited, there exists the possibility that these aquifers will be a future source of drinking water. The assumption that they will not be used can not be made.
2. Please see the response to Table 1.1, Item 2.
3. Please see the response to Table 1.1, Item 2.
4. Please see the response to Table 1.1, Item 2. In addition under New Jersey's A-280 program (VO's in drinking water) action levels are still valid.

Table 4.2

Please see the entire response to the comments concerning Table 1.1.

Table 4.4

This table is based on a guidance document developed in 1986. This document was transmitted to Steven Luftig of ERRD/USEPA on February 19, 1987. In addition please see the response to Table 1.1, Item 2.

Table 4.5

1 and 2:

These values are based on research work performed and models derived by NJDEP's Division of Science and Research. The models incorporate exposure and cancer risks in humans.

3. ND should be removed and None Noticeable be inserted.
4. It is up to the discretion of the EPA whether or not to provide this document to the Group.

Table 4.3


1. Please see the response to Table 1.1, Item 2.

2. The Group should contact the Division of Science and Research (NJDEP), the New Jersey Department of Health, and Rutgers University directly to obtain the information regarding soil clean-up levels. The NJDEP requests a list of the specific examples the Group refers to as historically approved excursions. The Group's consultants should request, in writing, the list of cases for which they would like to review the risk assessment data. This can be coordinated through the Bureau of Federal Case Management.
3. The Group's understanding is correct.
4. See Item 2 under this heading.

In reference to the comments on Page 6 concerning ACL's, the information on this site at this time is inadequate and the Risk Assessment is not yet complete. Therefore, it is not possible to generate applicable ACL's at the site. Once information is obtained and an acceptable Risk Assessment undertaken, the Group may propose ACL's for this site. It will be up to the discretion of EPA, in consultation with NJDEP, to approve or disapprove proposed ACL's.

If you have any questions or comments, please contact me immediately at (609) 633-0701.

Sincerely,


f Pamela A. Lange, Case Manager
Bureau of Federal Case Management

PAL:cn

cc: Kevin Schick, BEERA
Linda Welkom, DWR/BGWPA
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